

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

In re:

**Keith Gorman,
Debtor**

**Chapter 11
Case No. 22-10563-BAH**

**RESPONSE OF FRANCIS AND PATRICIA PROVENCHER
TO MOTION FOR ORDER FOR ADEQUATE PROTECTION [D.E. 104]**

NOW COME, Francis and Patricia Provencher (the “Provenchers”), by their attorneys Ford, McDonald & Borden, P.A. and respond to the Debtor’s Motion for Order Authorizing Debtor to Provide Francis and Patricia Provencher with Adequate Protection, including Periodic Payments (the “Motion”)[D.E. 104] and in support thereof say as follows:

1. The Provenchers support the relief requested in the Motion.
2. The Provenchers add, by way of notice, and not intended as a stipulation binding on the Debtor that, with interest accruals and costs, expenses and attorney’s fees the amount due to them as of March 31, 2023, is \$482,495.09.

WHEREFORE, The Provenchers respectfully request that this Honorable Court order and decree as follows:

- A. That the motion be granted; and
- B. Grant such other and further relief as may be just and equitable.

Respectfully submitted,
FRANCIS AND PATRICIA PROVENCHER

By their attorneys,
FORD, MCDONALD & BORDEN, P.A.

Dated: April 28, 2023

By: /s/ Edmond J. Ford
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CERTIFICATE OF SERVICE

On April 28, 2023, I electronically filed this document through the CM/ECF system, which will send a notice of electronic filing to:

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/s/ Edmond J. Ford
Edmond J. Ford, Esquire